



United States Department of the Interior

NATIONAL PARK SERVICE
Northeast Region
200 Chestnut Street
Philadelphia, PA 19106-2878

IN REPLY REFER TO:

H-32

JAN 26

Memorandum

To: Keeper, National Register of Historic Places

From: Acting Regional Director, Northeast Region *Christopher S. Wall*

Subject: Potential New Area of Significance, Dune Shacks of Peaked Hill Bars Historic District, Barnstable County, Massachusetts

I am requesting your consideration of a potential new area of significance for the Dune Shacks of the Peaked Hill Bars Historic District (District), determined eligible 05/19/1989, located within the Cape Cod National Seashore. The National Park Service (NPS) and the State Historic Preservation Officer do not agree as to whether or not the District meets the National Register criteria for traditional cultural significance and qualifies as a traditional cultural property. Currently, the property is recognized as significant for its role in the historical development of American art, literature and theater, for its association with the life of American poet Harry Kemp, and in the area of architecture.

In a letter dated September 20, 2006, the NPS consulted with the State Historic Preservation Officer regarding our conclusion that the Dune Shacks of the Peaked Bars Historic District did not meet National Register Criteria for eligibility as a traditional cultural property. The State Historic Preservation Officer responded on October 20, 2006, informing us that she was unable to agree, and recommended that we seek a formal determination from the Keeper of the National Register. We are now seeking that formal determination.

The position of the Northeast Regional Office staff is that:

- The District has historical significance for its role in the development of American art, literature and theater, for its association with the life of American poet Harry Kemp, and for its architecture. It was determined eligible by the Keeper in 1989.
- Members of core families preserve knowledge of shack histories and local traditions of shack use and maintenance that is greatly valued by the NPS.
- We agree with the consultants' assessment that the Lower Cape towns of Provincetown, Truro and Wellfleet may be considered as the "community" for purposes of this eligibility determination, but the NPS finds that the dune

dwellers and their networks of friends are not, as a whole, a segment of the Lower Cape community because significant numbers of them are long-term residents in other, off-Cape communities and thus are not associated with the historic contexts of the Lower Cape community.

- The dune families and their individualized networks are not a community in the sense used in Bulletin 38, due to their widely dispersed residential patterns and because many individuals have few associations with each other except during short periods of seasonal dune occupation. We believe they are more properly characterized as a collectivity practicing similar lifestyles while they are in the District.
- The District should not be considered eligible as a traditional cultural property under Bulletin 38.

Background:

In 2004, in response to an assertion by the Provincetown Board of Selectmen (May 14, 2003) that the District is associated with a community of dune dwellers who practice significant cultural traditions that should be preserved, and recognizing that additional information about the traditional use of the District was needed for developing a long-term management approach, the NPS sponsored ethnographic research to document the traditional cultural practices associated with the District. The final report, which was completed in 2005, is entitled "Dwelling in the Dunes: Traditional Use of the Dune Shacks of the Peaked Hill Bars Historic District, Cape Cod." After that study was complete the NPS contracted with two consultants, one of whom was the author of the ethnographic study, to evaluate the District according to the National Register Bulletin 38, Guidelines for Evaluating and Documenting Traditional Cultural Properties. This report entitled, "Traditional Cultural Property Assessment, Dune Shacks of the Peaked Hill Bars Historic District, Cape Cod National Seashore" concludes that the District meets the criteria to qualify as a traditional cultural property.

The NPS-sponsored research found that the dune shacks and the surrounding dune landscape are used in many different ways by a variety of different kinds of social groups. First and foremost, the locale is used seasonally by different extended family groups associated with each of the shacks, and secondarily by loose networks of their friends who use the shacks as the guests of core families (called "coteries" in the study). Each core family group (also described as long-term residents or dune dwellers) has a distinctive pattern of historic use and association with its shack or shack group, and its own set of landscape features about which knowledge has been developed and maintained within the family. For some people, particularly those within the core families, their customary use patterns and practices have been developed, maintained and passed down through multiple generations. These cultural practices and orientations to dwelling in the dunes are documented in the study. The "coteries" of friends and acquaintances are larger groupings linked to different core families based on their individual social connections with family members through whom they gain access to individual cottages. Persons within these groupings are described as short-term users.

According to Dr. Wolfe, the author of the ethnographic report, these two groups—long-term shack residents and short-term (invited) shack users—in the aggregate form a distinctive "dune

shack society" with identifiable cultural patterns associated with seasonal use of the District. However, the NPS finds that while the individual family networks share a common territory and traditional use practices situated in the District, they cannot be characterized as a society, that is, as an organized group of interdependent people who act together for collective survival and well-being.¹ Additionally, each of the shacks is occupied by groups with variable composition for the residential season. During the rest of the year, the members of these family groupings are more dispersed and may live some distance from the Cape or out of state. Furthermore, while each of the "coteries" of friends is identified through their relationships with core family members associated with one shack, they are not characterized as participating in a regular pattern of organization or structured interaction with other dune family networks. It is presumed that their off-season residential pattern is as dispersed as that of the core families.

The studies authors propose that the living community associated with the District is that of the Lower Cape, defined as Provincetown, Truro and Wellfleet. The traditional cultural significance of the District is based on its relationship with historical contexts of this larger community, specifically with certain practices associated with the development of the fine arts colony in Provincetown and others associated with descendants of Portuguese-Yankee fishing families from Provincetown. The study documents that certain practices associated with these traditions are emplaced in the District by members of core families and their coteries. What is not adequately established is that the dune dwelling families and their coteries constitute "a social segment" of the larger Lower Cape community in which these historic contexts are localized, as claimed on page 5 of the consultants' assessment report, for the reasons already described. While there are a number of core dune dwelling families that trace their descent from Portuguese-Yankee fishermen in Provincetown and members of many family groups practice art forms (professional and amateur), the group of shack users as a whole (which in 2004 was estimated to comprise 250 core family members and between 1,000 and 1,700 individuals in friends' networks) is not a distinguishable segment of the Lower Cape community.

NPS staff including the Northeast Region Ethnographer, Historian and National Register Coordinator carefully reviewed all the available information. We understand that the National Register guidelines are not intended to arbitrarily limit the evaluation of potential culturally significant properties but they do provide important policy direction about the components that need to be considered and that need to be present for properties to be considered eligible for the National Register. The Regional Office staff concludes that the dune shack 'community' does not fit into the meaning of the term 'community' as used in National Register Bulletin 38. Bulletin 38 uses the terms 'living community' and 'traditional cultural group,' but does not define these terms. The guidelines clearly refer to a traditional community as one that is defined by location related to year-round residences or employment, and characterized by a distinct cultural organization with cohesion and integration. The Bulletin offers several examples, including an Indian tribe, local ethnic group, rural community, urban neighborhood, class of religious practitioners, or the people of the nation as a whole. The NPS finds that the dune dwelling community, which is comprised of the long-term seasonally resident families and their extended

¹ This statement refers to a basic anthropological definition of society¹ as "an organized group or groups of interdependent people who generally share a common territory, language, and culture and who act together for collective survival and well-being" (Haviland et al 2005:348).

networks of friends, are not themselves a community or a distinct segment of a larger community within the meaning of the guidelines. So, while the dune shacks are important to the history of Provincetown and the outer Cape, the District cannot be considered to have traditional cultural significance under Bulletin 38.

We request your consideration of our findings and that of the Massachusetts Historical Commission, which reached a different conclusion, with respect to the District's possession of traditional cultural significance. Your determination will supplement the existing documentation for the District.

We are attaching all the relevant information for your review, including the following:

Wolfe, Robert J.

2005 Dwelling in the Dunes: Traditional Use of the Dune Shacks of the Peaked Hill Bars Historic District, Cape Cod. Final Report for the Research Project, "Traditional Cultural Significance of the Dune Shacks Historic District, Cape Cod National Seashore."

Wolfe, Robert J., and T.J. Ferguson

2006 Traditional Cultural Property Assessment, Dune Shacks of the Peaked Hill Bars Historic District, Cape Cod National Seashore. Phase II Report of the Research Project, "Traditional Cultural Significance of the Dune Shacks Historic District, Cape Cod National Seashore."

Letter from George E. Price, Jr., Superintendent of the Cape Cod National Seashore, to Brona G. Simon, Deputy State Historic Preservation Officer, Massachusetts Historical Commission, dated September 20, 2006.

Letter from Brona G. Simon, Deputy State Historic Preservation Officer, Massachusetts Historical Commission, to George E. Price, Jr., Superintendent of the Cape Cod National Seashore, dated October 20, 2006.

Letter from Sarah K. Peake, Vice-Chairman, Town of Provincetown Board of Selectmen, to Superintendent Price, Cape Cod National Seashore, dated November 27, 2006.

Letter from Fred Gaechter, Chair, Truro Board of Selectmen, to Superintendent Price, December 19, 2006.

We are also attaching a summary of major changes to the historic District since it was determined eligible in 1989.

Thank you for your consideration of this matter.

Attachments

cc: Brona Simon, Executive Director/Deputy State Historic Preservation Officer,
Massachusetts
John Roberts, National Register of Historic Places
Ronald Kaufman, Chairman, Cape Cod National Seashore Advisory Commission
Senator Edward Kennedy
Representative William Delahunt
Provincetown Historical Commission
Truro Historical Commission
Provincetown Board of Selectman
Truro Board of Selectman
Robert J. Wolfe, Robert J. Wolfe & Associates
Kelly Fannizo, Advisory Council on Historic Preservation
T. J. Ferguson
K. Bergman
J. Thomas
P. Clemons
D. Allee
Gail Cohen